

Exhibit B

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. CV 20-7811 RS
Plaintiff,)	
v.)	DECLARATION OF CLAUDIA QUIROZ IN
)	SUPPORT OF UNITED STATES' MOTION TO
)	STRIKE CLAIMANT ROMAN HOSSAIN'S CLAIM
Approximately 69,370 Bitcoin (BTC), Bitcoin)	
Gold (BTG), Bitcoin SV (BSV), and Bitcoin)	
Cash (BCH) seized from)	
1HQ3Go3ggs8pFnXuHVHRytPCq5fGG8Hbhhx)	
Defendant.)	

I, CLAUDIA QUIROZ, being duly sworn, depose and state:

1. I am an Assistant United States Attorney in the Northern District of California. I am an attorney of record in the above-referenced matter. I respectfully submit this declaration in Support of the United States' Motion to Strike Claimant Roman Hossain's Claim.

2. Attached hereto as Exhibit 1 is a true and correct copy of the United States' Special Interrogatories for Roman Hossain, Set No. 1, served on Yasin M. Almadani, counsel for Roman Hossain on February 11, 2021.

5. Attached hereto as Exhibit 4 is a true and correct copy of a letter dated April 4, 2021 from Yasin M. Almadani in response to the government's email dated March 26, 2021.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. Executed this 29th day of April 2021 in San Francisco, California.

Claudia Quiroz
CLAUDIA QUIROZ
Assistant United States Attorney

Exhibit 1

DAVID L. ANDERSON (CABN 149604)
United States Attorney

HALLIE HOFFMAN (CABN 210020)
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 20-CV-07811 RS
)	
Plaintiff,)	SPECIAL INTERROGATORIES FOR
)	ROMAN HOSSAIN, SET NO. 1
v.)	
)	
Approximately 69,370 Bitcoin (BTC), Bitcoin)	
Gold (BTG), Bitcoin SV (BSV), and Bitcoin Cash)	
(BCH) seized from)	
1HQ3Go3ggs8pFnXuHVHRytPCq5fGG8Hbhx;)	
)	
Defendant.)	
)	

PROPOUNDING PARTY: Plaintiff United States of America

RESPONDING PARTY: Claimant Roman Hossain

SET NUMBER: One

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure, Supplemental Rule G(6), plaintiff United States of America requests claimant, Roman Hossain, to answer each of the

1 following interrogatories separately, in writing and under oath, as prescribed by Rule 33 of the Federal
2 Rules of Civil Procedure and Local Rule of Civil Procedure 33, and to produce the requested documents,
3 all within 21 days, at the Office of the United States Attorney, 9th Floor, 450 Golden Gate Avenue, San
4 Francisco, California.

5 **I. INSTRUCTIONS AND DEFINITIONS**

6 **A. Instructions for Answering Interrogatories**

7 1. In answering these interrogatories, please furnish all information available to you,
8 including information in the possession of your attorney(s) or their investigators, and all persons acting
9 on your behalf and not merely such information known of your own personal knowledge. If you cannot
10 answer the interrogatories in full after exercising due diligence to secure the information, so state and
11 answer to the extent possible, specifying why you are unable to answer the remainder, describing the
12 efforts you have made to answer, and stating whatever information or knowledge you have concerning
13 the unanswered portions.

14 2. When your answer to any interrogatory is based in whole or in part upon information
15 supplied by a person other than yourself, please specifically so state as part of your answer to that
16 interrogatory and identify that person's name, address, and employment or other relationship to you.

17 3. When your answer to any interrogatory is based in whole or in part upon any document,
18 as defined above, or other tangible thing, please specifically so state as part of your answer to that
19 interrogatory and identify the document or tangible thing.

20 4. When any interrogatory contains a term included in the words defined below in the
21 subpart B, "Definitions," give to that term the meaning set forth for that term.

22 5. These interrogatories shall be deemed to be continuing to the extent set forth in Rule
23 26(e), Federal Rules of Civil Procedure. In the event information not provided in the original answers to
24 these interrogatories, which information is of a type referred to in Rule 26(e)(1) or (2), Federal Rules of
25 Civil Procedure, becomes personally known to claimant, or available to him through their attorney or
26 other agent(s), a supplemental answer in writing and under oath setting forth that additional information
27 is to be served upon plaintiff's undersigned attorneys within ten (10) days from the time such
28 information becomes known.

6. If you object to any interrogatory or request for production on the ground that it is oppressive or burdensome, please state:

- a. How many hours it would take to compile the information necessary to answer it;
- b. How many documents or files would have to be searched;
- c. Where those documents or files are located; and
- d. How much it would cost to answer the interrogatory or produce the documents.

7. If you object to any interrogatory or request for production on the basis of privilege, please comply with the requirements in Rule 26(b)(5). State separately state for each such objection the statutory or other basis of the claim of privilege as well as your reasons for believing that the alleged justification is applicable. In addition, describe generally the subject matter of the document and identify each person who has ever had possession, custody, or control of the document or any copy thereof. If the basis the claim is that the document is protected by the work product doctrine, identify the proceeding for which the document was prepared.

8. If you lack the information necessary to answer any of the interrogatories or provide documents, please describe the specific efforts made by you or anyone on your behalf to ascertain the information and state as definitively as possible when you anticipate obtaining the information and supplementing your response.

B. Definitions

9. The term “document” means any printed, typewritten, handwritten, or otherwise recorded matter of whatever character, including, but not limited to, medical records, printouts, computerized data, email, letters, purchase orders, invoices, memoranda, telegrams, notes, catalogs, brochures, diaries, reports, calendars, interoffice communications, statements, announcements, photographs, tape recordings, motion pictures and any electronic, carbon or photographic copies of any such material if you do not have custody or control of the original.

10. Where an interrogatory requests you to “identify” a document, the term “identify” means that you are to state the following information about each and every responsive document:

- a. The date of the document and the type of document, e.g., letter, memorandum, note;
- b. The name, present business address and position of its author or authors or, if the present

business address or position is unknown, state the person's last known business, address and position;

- c. The name, present or last known business address and position of its addressee and all other recipients of the document; and
- d. A general description of the subject of the document.

11. If any document requested to be “identified” or produced was, but is no longer in your possession or control or is no longer in existence, state whether it is:

- a. Missing or lost;
- b. Destroyed;
- c. Transferred voluntarily or involuntarily to others and, if so, to whom, and at what address; or
- d. Otherwise disposed of and, if so, how it was disposed of.

In each such instance explain the circumstances surrounding an authorization for such disposition of the document and state the proximate date of such disposition.

12. A document or oral communication “refers” or “relates” to a certain subject or thing if it discusses, mentions, describes, refers to, relates to, explains, embodies or pertains to that subject or thing.

13. The term “person” means natural persons, corporations, partnerships, sole proprietorships, unions, associations, federations, or any other kind of entity.

14. The term “identify” or “identity” when used in connection with a person means that you should state the following information about the “person”:

- a. Name;
- b. Present or last known address;
- c. Telephone number; and
- d. Email address.

15. The term “identify” or “identity” when used in connection with a person which is a legal entity such as a corporation, partnership, sole proprietorship, union, association, federation, or any other kind of entity means that you should state the following information about the “person”:

- a. Name;
- b. Present or last known address;
- c. Telephone number; and
- d. Email address.

16. The term “you” or “your” when used in this document refers to claimant in this action, Roman Hossain.

17. The term “defendant Bitcoin” or “defendant property” when used in this document refers to the defendant in this action, which is approximately 69,370 Bitcoin, Bitcoin Gold, Bitcoin SV, and Bitcoin Cash.

II. INTERROGATORIES

Special Interrogatory No. 1: State your full name for all names by which you are or have been known, including any and all aliases.

Special Interrogatory No. 2: State your Social Security Number and all Social Security Numbers you have used.

Special Interrogatory No. 3: List all Alien Registration Numbers you have been assigned or you have used.

Special Interrogatory No. 4: State the extent and describe with particularity the nature of your possessory interest in the defendant Bitcoin.

Special Interrogatory No. 5: State the extent and describe with particularity the nature of your ownership interest in the defendant Bitcoin.

Special Interrogatory No. 6: On what date(s) did you obtain your interest in the defendant Bitcoin?

Special Interrogatory No. 7: Identify the person(s) from whom you obtained your interest in the defendant Bitcoin.

Special Interrogatory No. 8: Describe the circumstances of each transaction by which you acquired or obtained any possessory interest in the defendant Bitcoin.

Special Interrogatory No. 9: Describe the circumstances of each transaction by which you acquired or obtained any ownership interest in the defendant Bitcoin.

Special Interrogatory No. 10: Explain the reason(s) for obtaining your interest in the defendant Bitcoin.

Special Interrogatory No. 11: Identify the name, account number, email address, and any other identifier associated with any account held by you at the Mt. Gox Exchange.

Special Interrogatory No. 12: Identify the name, account number, email address, and any other identifier associated with the account or accounts held by you at the Mt. Gox Exchange from which the Bitcoins you are claiming were allegedly stolen.

Special Interrogatory No. 13: Identify all witnesses, including the names, addresses, and telephone numbers of such witnesses, to the assertion in paragraph 5 of your claim that you held 245.98124 BTC at the Mt. Gox Exchange.

Special Interrogatory No. 14: List each and every document evidencing, recording, facilitating, or otherwise supporting the assertion in paragraph 5 of your claim that you held 245.98124 BTC at the Mt. Gox Exchange.

1 **Special Interrogatory No. 15:** Identify all witnesses, including the names, addresses, and telephone
2 numbers of such witnesses, to the assertion in paragraphs 2 and 6 of your claim that the hacked Bitcoins
3 from the Mt. Gox Exchange (including those you are claiming) were transferred from Mt. Gox to Silk
4 Road.

5
6 **Special Interrogatory No. 16:** List each and every document evidencing, recording, facilitating, or
7 otherwise supporting the assertion in paragraphs 2 and 6 of your claim that the hacked Bitcoins from the
8 Mt. Gox Exchange (including those you are claiming) were transferred from Mt. Gox to Silk Road.

9
10 **Special Interrogatory No. 17:** List each and every document evidencing, recording, facilitating, or
11 otherwise indicating each transaction you made using your wallet at the Mt. Gox Exchange between
12 March 1, 2012 and April 9, 2013.

13
14 **Special Interrogatory No. 18:** Identify all witnesses, including the names, addresses, and telephone
15 numbers of such witnesses, to the assertion in paragraph 4 of your claim that “[o]n or before March 1,
16 2012, you opened an account on the Mt. Gox Exchange and deposited \$2,475 USD to purchase BTC.”

17
18 **Special Interrogatory No. 19:** List each and every document evidencing, recording, facilitating, or
19 otherwise supporting the assertion in paragraph 4 of your claim that “[o]n or before March 1, 2012, you
20 opened an account on the Mt. Gox Exchange and deposited \$2,475 USD to purchase BTC.”

21
22 **Special Interrogatory No. 20:** Identify all witnesses, including the names, addresses, and telephone
23 numbers of such witnesses, to the assertion in paragraph 4 of your claim that you purchased BTC on the
24 Mt. Gox Exchange after opening your account in March 2012.

25
26 **Special Interrogatory No. 21:** List each and every document evidencing, recording, facilitating, or
27 otherwise supporting the assertion in paragraph 4 of your claim that you purchased BTC on the Mt. Gox
28 Exchange after opening your account in March 2012.

1 **Special Interrogatory No. 22:** List each and every document evidencing, recording, facilitating, or
2 otherwise relating to any transaction identified in response to Special Interrogatory No. 4.

3
4 **Special Interrogatory No. 23:** List each and every document evidencing, recording, facilitating, or
5 otherwise relating to your answer in response to Special Interrogatory No. 4.

6
7 **Special Interrogatory No. 24:** List each and every document evidencing, recording, facilitating, or
8 otherwise relating to your answer in response to Special Interrogatory No. 5.

9
10 **Special Interrogatory No. 25:** List each and every document evidencing, recording, facilitating, or
11 otherwise relating to your answer in response to Special Interrogatory No. 6.

12
13 **Special Interrogatory No. 26:** List each and every document evidencing, recording, facilitating, or
14 otherwise relating to your answer in response to Special Interrogatory No. 7.

15
16 **Special Interrogatory No. 27:** List each and every document evidencing, recording, facilitating, or
17 otherwise relating to your answer in response to Special Interrogatory No. 8.

18
19 **Special Interrogatory No. 28:** List each and every document evidencing, recording, facilitating, or
20 otherwise relating to your answer in response to Special Interrogatory No. 9.

21
22 **Special Interrogatory No. 29:** List each and every document evidencing, recording, facilitating, or
23 otherwise relating to your answer in response to Special Interrogatory No. 10.

24
25 **Special Interrogatory No. 30:** List each and every document evidencing, recording, facilitating, or
26 otherwise relating to any transaction identified in response to Special Interrogatory No. 11.

Special Interrogatory No. 31: List each and every document evidencing, recording, facilitating, or otherwise relating to any transaction identified in response to Special Interrogatory No. 12.

* * * * *

Respectfully submitted,

DAVID L. ANDERSON
United States Attorney

Dated: February 11, 2021

/s/

CLAUDIA QUIROZ
CHRIS KALTSAS
Assistant United States Attorneys

Exhibit 2

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Attorney for Claimant Roman Hossain

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA

Plaintiff,

vs.

Approximately 69,370 Bitcoin (BTC),
 Bitcoin Gold (BTG), Bitcoin SV (BSV),
 and Bitcoin Cash (BCH) seized from
 1HQ3Go3ggs8pFnXuHVHRytPCq5fGG
 8Hbhx,

Defendant.

ROMAN HOSSAIN,

Claimant.

Case No. CV 20-7811 RS

**CLAIMANT ROMAN HOSSAIN'S
 OBJECTIONS AND RESPONSES TO
 PLAINTIFF UNITED STATES OF
 AMERICA'S SPECIAL
 INTERROGATORIES TO
 CLAIMANT ROMAN HOSSAIN
 PURSUANT TO RULE G (SET ONE)**

PROPOUNDING PARTY: PLAINTIFF UNITED STATES OF AMERICA

RESPONDING PARTY: CLAIMANT ROMAN HOSSAIN

SET NUMBER: ONE

/ / /

/ / /

TO PLAINTIFF UNITED STATES OF AMERICA AND THEIR ATTORNEYS OF RECORD:

Claimant Roman Hossain (“Claimant” or “Responding Party”) hereby submits this response to the Interrogatories served pursuant to Rules 26, 33, and Rule G(6) of the Supplemental Rules for Admiralty or Maritime Claims, Set No. One, propounded by Plaintiff United States of America (“Plaintiff” or “Propounding Party”), as follows:

I. PRELIMINARY STATEMENT.

Responding Party has not completed investigation and discovery in this matter, and has not completed preparation for trial. The following responses are based on Responding Party’s knowledge as of the date of these responses, and are limited to information currently available to Responding Party after reasonable and diligent investigation. The responses are given without prejudice to Responding Party’s right to produce evidence of any subsequently discovered facts and/or documents. Responding Party will respond to each Interrogatory as he understands and interprets the Interrogatory. If Propounding Parties assert an interpretation of a specific Interrogatory that differs from that of Responding Party, Responding Party reserves his right to change and/or supplement his objections and/or responses. In addition, Responding Party will produce information in this matter only after a detailed Protective Order is entered that contains adequate confidentiality protections for the information demanded.

II. GENERAL OBJECTIONS AND QUALIFICATIONS.

The following General Objections are in addition to, and are incorporated in, each of the Specific Responses set forth in Part III below:

1. Responding Party objects to these Interrogatories to the extent they attempt to impose obligations upon the Responding Party other than those imposed or authorized by the Federal Rules of Civil Procedure, including as to the source of documents and including furnishing materials outside of his possession or control or providing settlement materials. In addition, this set of Interrogatories is generally overbroad and premature because it goes beyond the restricted scope of Rule G(6) interrogatories permitting limited discovery on

1 “claimant’s identity and relationship to the defendant property” for purposes of
2 determining standing. Plaintiff abuses Rule G to conduct one-sided, merits-based discovery
3 that is not yet open under Rule 26 and Local Rule 16-7, and impermissibly uses Rule G
4 interrogatories to go beyond the 25-interrogatory limit set under Rule 33, causing undue
5 burden to Claimant in violation of the Federal Rules of Civil Procedure and the Local
6 Rules.

7 2. Responding Party objects to these Interrogatories to the extent they seek
8 information or documents that are protected from discovery by the attorney-client
9 privilege, the attorney work product doctrine, privacy protections under state or federal
10 law, and/or that are otherwise immune or protected from disclosure. Responding Party
11 does not intend to waive any applicable protections or privileges through the supplying of
12 information or production of documents in connection with these Interrogatories; on the
13 contrary, Responding Party specifically intends to preserve any and all applicable
14 protections or privileges.

15 3. Inadvertent production of any document in connection with these
16 Interrogatories by Responding Party shall not constitute a waiver of any privilege or any
17 other ground for objecting to discovery with respect to such document, any other document,
18 to the subject matter thereof, or any information contained therein; nor shall such
19 inadvertent production waive Responding Party’s right to demand that such documents be
20 returned or to object to the use of the document or the information contained therein during
21 this or any other proceeding.

22 4. Responding Party objects to these Interrogatories to the extent they purport to
23 require, in connection with these Interrogatories, an expert opinion or production of
24 documents, notes, charts, photos, and/or other document summary prepared by an expert.

25 5. Responding Party objects to these Interrogatories as overly broad and unduly
26 burdensome to the extent they purport to seek information or documents without limitation,
27 including without regard to a specific timeframe or date cut-off. Any production of
28 documents by Responding Party in connection with these Interrogatories shall be subject

1 to and without waiver of any of the objections stated herein, and shall not be deemed to be
 2 an admission on the part of Responding Party that such information or documents are either
 3 relevant or admissible.

4 6. Responding Party, in connection with these Interrogatories, objects to the
 5 Interrogatories to the extent they call for the production of private or personal identifying
 6 information protected by the right of privacy guaranteed by the United States and
 7 California Constitutions or other information that Responding Party is required to protect
 8 pursuant to Federal Law.

9 7. Responding Party objects to these Interrogatories to the extent they call for
 10 information or documents that are outside of the possession, custody or control of
 11 Responding Party, or are in the possession of third parties, and/or in the public domain or
 12 otherwise obtainable from some other source that is more convenient, less burdensome,
 13 equally available to asking party, or less expensive.

14 8. Because of the overly broad nature of these Interrogatories, it is not possible
 15 for Responding Party to anticipate all possible grounds for objection with respect to any
 16 particular Interrogatory set forth herein. Responding Party reserves the right to supplement
 17 or correct these responses and to raise any additional objections deemed necessary and
 18 appropriate in light of the results of any further review.

19 **III. SPECIFIC RESPONSES.**

20 Subject to and without waiving the foregoing General Objections and Qualifications,
 21 all of which are incorporated as to each Interrogatory below as though fully stated therein,
 22 Responding Party responds as follows:

23 **OBJECTIONS AND RESPONSES TO SPECIAL INTERROGATORIES**

24 **SPECIAL INTERROGATORY NO. 1:**

25 State your full name for all names by which you are or have been known, including
 26 any and all aliases.

27 **RESPONSE TO SPECIAL INTERROGATORY NO. 1:**

28 Responding Party incorporates each of its General Objections set forth above by

reference. Responding Party further objects to this Interrogatory on the ground that it seeks information that is irrelevant and/or information that is not reasonably calculated to lead to the discovery of admissible evidence.

Responding Party objects that this Interrogatory is overbroad and thus imposes an undue burden on Responding Party to respond to this Interrogatory.

Responding Party objects that this Interrogatory seeks information that constitutes an invasion of Responding Party's privacy.

Subject to, and without waiving the foregoing objections, Responding Party responds as follows: Roman Hossain, Roman M. Hossain, Roman Muntakim Hossain.

Investigation is continuing and Rule 26 discovery has not commenced. Responding Party reserves the right to supplement and/or amend this Response.

SPECIAL INTERROGATORY NO. 2:

State your Social Security Number and all Social Security Numbers you have used.

RESPONSE TO SPECIAL INTERROGATORY NO. 2:

Responding Party incorporates each of its General Objections set forth above by reference. Responding Party further objects to this Interrogatory on the ground that it seeks information that is irrelevant and/or information that is not reasonably calculated to lead to the discovery of admissible evidence.

Responding Party objects that this Interrogatory is overbroad and thus imposes an undue burden on Responding Party to respond to this Interrogatory.

Responding Party objects that this Interrogatory seeks information that constitutes an invasion of Responding Party's privacy.

Subject to, and without waiving the foregoing objections, Responding Party responds as follows: [REDACTED]. This information should be treated with the utmost confidentiality and is subject to all rules and regulations protecting personally identifying information. This answer should not be filed in a public filing without redaction of Claimant's Social Security Number.

Investigation is continuing and Rule 26 discovery has not commenced. Responding

1 Party reserves the right to supplement and/or amend this Response.

2 **SPECIAL INTERROGATORY NO. 3:**

3 List all Alien Registration Numbers you have been assigned or you have used.

4 **RESPONSE TO SPECIAL INTERROGATORY NO. 3:**

5 Responding Party incorporates each of its General Objections set forth above by
6 reference. Responding Party further objects to this Interrogatory on the ground that it seeks
7 information that is irrelevant and/or information that is not reasonably calculated to lead
8 to the discovery of admissible evidence.

9 Responding Party objects that this Interrogatory is overbroad and thus imposes an
10 undue burden on Responding Party to respond to this Interrogatory.

11 Responding Party objects that this Interrogatory seeks information that constitutes
12 an invasion of Responding Party's privacy.

13 Subject to, and without waiving the foregoing objections, Responding Party
14 responds as follows: Responding Party is not aware of any Alien Registration Numbers
15 that it has been assigned or has used.

16 Investigation is continuing and Rule 26 discovery has not commenced. Responding
17 Party reserves the right to supplement and/or amend this Response.

18 **SPECIAL INTERROGATORY NO. 4:**

19 State the extent and describe with particularity the nature of your possessory interest
20 in the defendant Bitcoin.

21 **RESPONSE TO SPECIAL INTERROGATORY NO. 4:**

22 Responding Party incorporates each of its General Objections set forth above by
23 reference. Responding Party further objects that this Interrogatory is overbroad and is
24 premature to the extent it requests Responding Party to recite all evidence to support its
25 case. Responding Party has no such obligation at this early stage of the litigation before
26 fact and expert discovery have been completed. Responding Party further objects to this
27 Interrogatory to the extent it seeks information that constitutes an invasion of Responding
28 Party's privacy.

1 Subject to, and without waiving the foregoing objections, Responding Party
 2 responds as follows: Responding Party believes Responding Party is the original, rightful,
 3 and innocent owner of at least 245.92 of the 69,370 Bitcoin (“BTC”) seized by the
 4 government from Blockchain address 1HQ3Go3ggs8pFnXuHVHRytPCq5fGG8Hbhx
 5 (the “1HQ3” wallet) that is the subject of this forfeiture action. The BTC belonging to
 6 Responding Party was held by Responding Party at the Mt. Gox Exchange, from where it
 7 was stolen by hackers and transferred to Silk Road, and stolen again and transferred to the
 8 1HQ3 wallet, from which it was seized by the government.

9 The Mt. Gox Exchange website was a website on the worldwide web on which the
 10 public could openly and legitimately purchase BTC. Many people did so for investment
 11 purposes hoping for appreciation over time. On or before March 1, 2012, Responding Party
 12 opened an account on the Mt. Gox Exchange and deposited \$2,475 USD to purchase BTC
 13 with the hope that Responding Party’s BTC investment would appreciate over time.
 14 Responding Party thereafter openly and legitimately purchased BTC on the Mt. Gox
 15 Exchange for investment purposes, and for no unlawful purpose. During this time,
 16 Responding Party graduated from the University of California, Irvine, Paul Merage School
 17 of Business with an MBA and was awaiting matriculation to law school. Responding
 18 Party’s Mt. Gox account balance at the time hackers were stealing BTC from Mt. Gox was
 19 245.98124 BTC, and at least 245.92 BTC was stolen from Responding Party.

20 Based on information and belief, between 2011 and 2014, the Mt. Gox Exchange
 21 experienced several hacks, which resulted in the theft of significant BTC that ended up in
 22 Silk Road, from where it was stolen again and transferred to the 1HQ3 wallet as follows:
 23 Between May 5, 2012 and April 9, 2013, BTC wallets with Blockchain addresses
 24 1BBqjKsYuLEUE9Y5WzdbzCtYzCiQgHqtPN (the “1BB wallet”) and
 25 1BADznNF3W1gi47R65MQs754KB7zTaGuYZ (the “1BAD wallet”) received
 26 approximately 47,599 BTC and 22,813 BTC, respectively, stolen from Silk Road (*see* First
 27 Am Compl. ¶¶ 15-16); these transfers contained mostly, if not entirely, the BTC that was
 28 stolen from Mt. Gox Exchange by hackers, which Responding Party believes included

1 Responding Party's BTC. On April 9, 2013, the stolen BTC was transferred from the 1BB
 2 and 1 BAD wallets to the 1HQ3 wallet from which it was seized by the government and is
 3 the subject of this forfeiture action. (*Id.* at ¶¶ 18-19, 23.) Responding Party believes that
 4 the BTC in the government's possession thus contains the BTC that was stolen from
 5 Responding Party, a fact that Mt. Gox actively concealed from Responding Party, as
 6 explained further below.

7 Based on information and belief, between 2011 and 2014, Mt. Gox was actively
 8 concealing the fact that its accounts were being hacked and customers' BTC was being
 9 stolen and placed into Silk Road. In other words, Mt. Gox ledgers were not accurate, and
 10 customers were being deceived with ledgers showing BTC that had been stolen and was
 11 gone. Indeed, Mark Marie Robert Karpelès, the former CEO of Mt. Gox Exchange, was
 12 prosecuted and found guilty by the Tokyo District Court of falsifying data to inflate Mt.
 13 Gox's holdings by \$33.5 million to its account holders. The Japanese court found that
 14 Karpelès had inflicted massive harm to the trust of his users. Any usage or transfer of the
 15 BTC that was stolen from Responding Party by hackers was done without Responding
 16 Party's knowledge or consent.

17 Of the BTC that this the subject of this forfeiture action, Responding Party believes
 18 that Responding Party is an innocent owner of at least 245.92 BTC (and all associated past
 19 and future BTC forks, including but not limited to BTG, BSV, BCH, etc.), and Responding
 20 Party's interest predates and supersedes the government's forfeiture claim. Based on the
 21 foregoing, the 245.92 BTC that is the subject of this claim should not be forfeited but
 22 returned to Responding Party.

23 Investigation is continuing and Rule 26 discovery has not commenced. Responding
 24 Party reserves the right to supplement and/or amend this Response.

25 **SPECIAL INTERROGATORY NO. 5:**

26 State the extent and describe with particularity the nature of your ownership interest
 27 in the defendant Bitcoin.

28 **RESPONSE TO SPECIAL INTERROGATORY NO. 5:**

1 Responding Party incorporates each of its General Objections set forth above by
2 reference. Responding Party further objects that this Interrogatory is overbroad and is
3 premature to the extent it requests Responding Party to recite all evidence to support its
4 case. Responding Party has no such obligation at this early stage of the litigation before
5 fact and expert discovery have been completed. Responding Party further objects to this
6 Interrogatory to the extent it seeks information that constitutes an invasion of Responding
7 Party's privacy.

8 Subject to, and without waiving the foregoing objections, Responding Party
9 responds as follows: Responding Party believes Responding Party is the original, rightful,
10 and innocent owner of at least 245.92 of the 69,370 Bitcoin ("BTC") seized by the
11 government from Blockchain address 1HQ3Go3ggs8pFnXuHVHRytPCq5fGG8Hbhx
12 (the "1HQ3" wallet) that is the subject of this forfeiture action. The BTC belonging to
13 Responding Party was held by Responding Party at the Mt. Gox Exchange, from where it
14 was stolen by hackers and transferred to Silk Road, and stolen again and transferred to the
15 1HQ3 wallet, from which it was seized by the government.

16 The Mt. Gox Exchange website was a website on the worldwide web on which the
17 public could openly and legitimately purchase BTC. Many people did so for investment
18 purposes hoping for appreciation over time. On or before March 1, 2012, Responding Party
19 opened an account on the Mt. Gox Exchange and deposited \$2,475 USD to purchase BTC
20 with the hope that Responding Party's BTC investment would appreciate over time.
21 Responding Party thereafter openly and legitimately purchased BTC on the Mt. Gox
22 Exchange for investment purposes, and for no unlawful purpose. During this time,
23 Responding Party graduated from the University of California, Irvine, Paul Merage School
24 of Business with an MBA and was awaiting matriculation to law school. Responding
25 Party's Mt. Gox account balance at the time hackers were stealing BTC from Mt. Gox was
26 245.98124 BTC, and at least 245.92 BTC was stolen from Responding Party.

27 Based on information and belief, between 2011 and 2014, the Mt. Gox Exchange
28 experienced several hacks, which resulted in the theft of significant BTC that ended up in

1 Silk Road, from where it was stolen again and transferred to the 1HQ3 wallet as follows:
 2 Between May 5, 2012 and April 9, 2013, BTC wallets with Blockchain addresses
 3 1BBqjKsYuLEUE9Y5WzdbzCtYzCiQgHqtPN (the “1BB wallet”) and
 4 1BADznNF3W1gi47R65MQs754KB7zTaGuYZ (the “1BAD wallet”) received
 5 approximately 47,599 BTC and 22,813 BTC, respectively, stolen from Silk Road (*see* First
 6 Am Compl. ¶¶ 15-16); these transfers contained mostly, if not entirely, the BTC that was
 7 stolen from Mt. Gox Exchange by hackers, which Responding Party believes included
 8 Responding Party’s BTC. On April 9, 2013, the stolen BTC was transferred from the 1BB
 9 and 1 BAD wallets to the 1HQ3 wallet from which it was seized by the government and is
 10 the subject of this forfeiture action. (*Id.* at ¶¶ 18-19, 23.) Responding Party believes that
 11 the BTC in the government’s possession thus contains the BTC that was stolen from
 12 Responding Party, a fact that Mt. Gox actively concealed from Responding Party, as
 13 explained further below.

14 Based on information and belief, between 2011 and 2014, Mt. Gox was actively
 15 concealing the fact that its accounts were being hacked and customers’ BTC was being
 16 stolen and placed into Silk Road. In other words, Mt. Gox ledgers were not accurate, and
 17 customers were being deceived with ledgers showing BTC that had been stolen and was
 18 gone. Indeed, Mark Marie Robert Karpelès, the former CEO of Mt. Gox Exchange, was
 19 prosecuted and found guilty by the Tokyo District Court of falsifying data to inflate Mt.
 20 Gox’s holdings by \$33.5 million to its account holders. The Japanese court found that
 21 Karpelès had inflicted massive harm to the trust of his users. Any usage or transfer of the
 22 BTC that was stolen from Responding Party by hackers was done without Responding
 23 Party’s knowledge or consent.

24 Of the BTC that this the subject of this forfeiture action, Responding Party believes
 25 that Responding Party is an innocent owner of at least 245.92 BTC (and all associated past
 26 and future BTC forks, including but not limited to BTG, BSV, BCH, etc.), and Responding
 27 Party’s interest predates and supersedes the government’s forfeiture claim. Based on the
 28 foregoing, the 245.92 BTC that is the subject of this claim should not be forfeited but

1 returned to Responding Party.

2 Investigation is continuing and Rule 26 discovery has not commenced. Responding
3 Party reserves the right to supplement and/or amend this Response.

4 **SPECIAL INTERROGATORY NO. 6:**

5 On what date(s) did you obtain your interest in the defendant Bitcoin?

6 **RESPONSE TO SPECIAL INTERROGATORY NO. 6:**

7 Responding Party incorporates each of its General Objections set forth above by
8 reference. Responding Party further objects that this Interrogatory seeks information that
9 constitutes an invasion of Responding Party's privacy.

10 Subject to, and without waiving the foregoing objections, Responding Party
11 responds as follows: The Mt. Gox Exchange website was a website on the worldwide web
12 on which the public could openly and legitimately purchase BTC. Many people did so for
13 investment purposes hoping for appreciation over time. On or before March 1, 2012,
14 Responding Party opened an account on the Mt. Gox Exchange and deposited \$2,475 USD
15 to purchase BTC with the hope that Responding Party's BTC investment would appreciate
16 over time. Responding Party thereafter openly and legitimately purchased BTC on the Mt.
17 Gox Exchange for investment purposes, and for no unlawful purpose. During this time,
18 Responding Party graduated from the University of California, Irvine, Paul Merage School
19 of Business with an MBA and was awaiting matriculation to law school. Responding
20 Party's Mt. Gox account balance at the time hackers were stealing BTC from Mt. Gox was
21 245.98124 BTC, and at least 245.92 BTC was stolen from Responding Party.

22 Investigation is continuing and Rule 26 discovery has not commenced. Responding
23 Party reserves the right to supplement and/or amend this Response.

24 **SPECIAL INTERROGATORY NO. 7:**

25 Identify the person(s) from whom you obtained your interest in the defendant
26 Bitcoin.

27 **RESPONSE TO SPECIAL INTERROGATORY NO. 7:**

28 Responding Party incorporates each of its General Objections set forth above by

reference. Responding Party further objects to this Interrogatory on the ground that it seeks information that is irrelevant and/or information that is not reasonably calculated to lead to the discovery of admissible evidence.

Responding Party further objects to this Interrogatory to the extent it calls for speculation in that Responding Party is not aware of the identity of every person who had invested in Bitcoin on the Mt. Gox exchange in the same way a person is cannot know the identity of every bank depositor or purchaser of stocks or commodities on any stocks or commodities exchange.

Subject to, and without waiving the foregoing objections, Responding Party responds as follows:

Investigation is continuing and Rule 26 discovery has not commenced. Responding Party reserves the right to supplement and/or amend this Response.

SPECIAL INTERROGATORY NO. 8:

Describe the circumstances of each transaction by which you acquired or obtained any possessory interest in the defendant Bitcoin.

RESPONSE TO SPECIAL INTERROGATORY NO. 8:

Responding Party incorporates each of its General Objections set forth above by reference. Responding Party further objects that this Interrogatory is overbroad and is premature because it goes beyond the restricted scope of Rule G interrogatories permitting limited discovery on “claimant’s identity and relationship to the defendant property” for purposes of determining standing, which claimant has sufficiently identified. Plaintiff abuses Rule G to conduct one-sided, merits-based discovery that is not yet open under Rule 26 and Local Rule 16-7, and impermissibly uses Rule G interrogatories to go beyond the 25-interrogatory limit set under Rule 33, causing undue burden to Claimant in violation of the Federal Rules of Civil Procedure and the Local Rules. Even under Rule 26, Responding Party has no obligation at this early stage of the litigation before fact and expert discovery have been completed to recite all evidence to support its case. Furthermore, at the appropriate time, Responding Party reserves its right to invoke the option to produce

documents under Rule 33(d) of the Federal Rules of Civil Procedure, because the answer to an interrogatory such as this may be determined by examining or summarizing Responding Party's documents and the burden of deriving or ascertaining the answer will be substantially the same for either party. Responding Party objects further that this Interrogatory seeks information that is already in the possession of, or is equally available to, Propounding Party. This Interrogatory therefore imposes an undue burden on Responding Party.

Subject to, and without waiving the foregoing objections, Responding Party responds as follows to provide an answer that sufficiently establishes Responding Party's standing to file a claim: The Mt. Gox Exchange website was a website on the worldwide web on which the public could openly and legitimately purchase BTC. Many people did so for investment purposes hoping for appreciation over time. On or before March 1, 2012, Responding Party opened an account on the Mt. Gox Exchange and deposited \$2,475 USD to purchase BTC with the hope that Responding Party's BTC investment would appreciate over time. Responding Party thereafter openly and legitimately purchased BTC on the Mt. Gox Exchange for investment purposes, and for no unlawful purpose. During this time, Responding Party graduated from the University of California, Irvine, Paul Merage School of Business with an MBA and was awaiting matriculation to law school. Responding Party's Mt. Gox account balance at the time hackers were stealing BTC from Mt. Gox was 245.98124 BTC, and at least 245.92 BTC was stolen from Responding Party.

Investigation is continuing and Rule 26 discovery has not commenced. Responding Party reserves the right to supplement and/or amend this Response.

SPECIAL INTERROGATORY NO. 9:

Describe the circumstances of each transaction by which you acquired or obtained any ownership interest in the defendant Bitcoin.

RESPONSE TO SPECIAL INTERROGATORY NO. 9:

Responding Party incorporates each of its General Objections set forth above by reference. Responding Party further objects that this Interrogatory is overbroad and is

1 premature because it goes beyond the restricted scope of Rule G interrogatories permitting
2 limited discovery on “claimant’s identity and relationship to the defendant property” for
3 purposes of determining standing, which claimant has sufficiently identified. Plaintiff
4 abuses Rule G to conduct one-sided, merits-based discovery that is not yet open under Rule
5 26 and Local Rule 16-7, and impermissibly uses Rule G interrogatories to go beyond the
6 25-interrogatory limit set under Rule 33, causing undue burden to Claimant in violation of
7 the Federal Rules of Civil Procedure and the Local Rules. Even under Rule 26, Responding
8 Party has no obligation at this early stage of the litigation before fact and expert discovery
9 have been completed to recite all evidence to support its case. Furthermore, at the
10 appropriate time, Responding Party reserves its right to invoke the option to produce
11 documents under Rule 33(d) of the Federal Rules of Civil Procedure, because the answer
12 to an interrogatory such as this may be determined by examining or summarizing
13 Responding Party’s documents and the burden of deriving or ascertaining the answer will
14 be substantially the same for either party. Responding Party objects further that this
15 Interrogatory seeks information that is already in the possession of, or is equally available
16 to, Propounding Party. This Interrogatory therefore imposes an undue burden on
17 Responding Party.

18 Subject to, and without waiving the foregoing objections, Responding Party
19 responds as follows to provide an answer that sufficiently establishes Responding Party’s
20 standing to file a claim: The Mt. Gox Exchange website was a website on the worldwide
21 web on which the public could openly and legitimately purchase BTC. Many people did
22 so for investment purposes hoping for appreciation over time. On or before March 1, 2012,
23 Responding Party opened an account on the Mt. Gox Exchange and deposited \$2,475 USD
24 to purchase BTC with the hope that Responding Party’s BTC investment would appreciate
25 over time. Responding Party thereafter openly and legitimately purchased BTC on the Mt.
26 Gox Exchange for investment purposes, and for no unlawful purpose. During this time,
27 Responding Party graduated from the University of California, Irvine, Paul Merage School
28 of Business with an MBA and was awaiting matriculation to law school. Responding

1 Party's Mt. Gox account balance at the time hackers were stealing BTC from Mt. Gox was
2 245.98124 BTC, and at least 245.92 BTC was stolen from Responding Party.

3 Investigation is continuing and Rule 26 discovery has not commenced. Responding
4 Party reserves the right to supplement and/or amend this Response.

5 **SPECIAL INTERROGATORY NO. 10:**

6 Explain the reason(s) for obtaining your interest in the defendant Bitcoin.

7 **RESPONSE TO SPECIAL INTERROGATORY NO. 10:**

8 Responding Party incorporates each of its General Objections set forth above by
9 reference. Responding Party further objects that this Interrogatory is overbroad and is
10 premature because it goes beyond the restricted scope of Rule G interrogatories permitting
11 limited discovery on "claimant's identity and relationship to the defendant property" for
12 purposes of determining standing, which claimant has sufficiently identified. Plaintiff
13 abuses Rule G to conduct one-sided, merits-based discovery that is not yet open under Rule
14 26 and Local Rule 16-7, and impermissibly uses Rule G interrogatories to go beyond the
15 25-interrogatory limit set under Rule 33, causing undue burden to Claimant in violation of
16 the Federal Rules of Civil Procedure and the Local Rules. Even under Rule 26, Responding
17 Party has no obligation at this early stage of the litigation before fact and expert discovery
18 have been completed to recite all evidence to support its case. Furthermore, at the
19 appropriate time, Responding Party reserves its right to invoke the option to produce
20 documents under Rule 33(d) of the Federal Rules of Civil Procedure, because the answer
21 to an interrogatory such as this may be determined by examining or summarizing
22 Responding Party's documents and the burden of deriving or ascertaining the answer will
23 be substantially the same for either party. Responding Party objects further that this
24 Interrogatory seeks information that is already in the possession of, or is equally available
25 to, Propounding Party. This Interrogatory therefore imposes an undue burden on
26 Responding Party.

27 Subject to, and without waiving the foregoing objections, Responding Party
28 responds as follows to provide an answer that sufficiently establishes Responding Party's

standing to file a claim: The Mt. Gox Exchange website was a website on the worldwide web on which the public could openly and legitimately purchase BTC. Many people did so for investment purposes hoping for appreciation over time. On or before March 1, 2012, Responding Party opened an account on the Mt. Gox Exchange and deposited \$2,475 USD to purchase BTC with the hope that Responding Party's BTC investment would appreciate over time. Responding Party thereafter openly and legitimately purchased BTC on the Mt. Gox Exchange for investment purposes, and for no unlawful purpose. During this time, Responding Party graduated from the University of California, Irvine, Paul Merage School of Business with an MBA and was awaiting matriculation to law school. Responding Party's Mt. Gox account balance at the time hackers were stealing BTC from Mt. Gox was 245.98124 BTC, and at least 245.92 BTC was stolen from Responding Party.

Investigation is continuing and Rule 26 discovery has not commenced. Responding Party reserves the right to supplement and/or amend this Response.

SPECIAL INTERROGATORY NO. 11:

Identify the name, account number, email address, and any other identifier associated with any account held by you at the Mt. Gox Exchange.

RESPONSE TO SPECIAL INTERROGATORY NO. 11:

Responding Party incorporates each of its General Objections set forth above by reference. Responding Party further objects that this Interrogatory is overbroad and is premature because it goes beyond the restricted scope of Rule G interrogatories permitting limited discovery on "claimant's identity and relationship to the defendant property" for purposes of determining standing, which claimant has sufficiently identified. Plaintiff abuses Rule G to conduct one-sided, merits-based discovery that is not yet open under Rule 26 and Local Rule 16-7, and impermissibly uses Rule G interrogatories to go beyond the 25-interrogatory limit set under Rule 33, causing undue burden to Claimant in violation of the Federal Rules of Civil Procedure and the Local Rules. Even under Rule 26, Responding Party has no obligation at this early stage of the litigation before fact and expert discovery have been completed to recite all evidence to support its case. Furthermore, at the

1 appropriate time, Responding Party reserves its right to invoke the option to produce
 2 documents under Rule 33(d) of the Federal Rules of Civil Procedure, because the answer
 3 to an interrogatory such as this may be determined by examining or summarizing
 4 Responding Party's documents and the burden of deriving or ascertaining the answer will
 5 be substantially the same for either party. Responding Party objects further that this
 6 Interrogatory seeks information that is already in the possession of, or is equally available
 7 to, Propounding Party. This Interrogatory therefore imposes an undue burden on
 8 Responding Party.

9 Investigation is continuing and Rule 26 discovery has not commenced. Responding
 10 Party reserves the right to supplement and/or amend this Response.

11 **SPECIAL INTERROGATORY NO. 12:**

12 Identify the name, account number, email address, and any other identifier
 13 associated with the account or accounts held by you at the Mt. Gox Exchange from which
 14 the Bitcoins you are claiming were allegedly stolen.

15 **RESPONSE TO SPECIAL INTERROGATORY NO. 12:**

16 Responding Party incorporates each of its General Objections set forth above by
 17 reference. Responding Party further objects that this Interrogatory is overbroad and is
 18 premature because it goes beyond the restricted scope of Rule G interrogatories permitting
 19 limited discovery on "claimant's identity and relationship to the defendant property" for
 20 purposes of determining standing, which claimant has sufficiently identified. Plaintiff
 21 abuses Rule G to conduct one-sided, merits-based discovery that is not yet open under Rule
 22 26 and Local Rule 16-7, and impermissibly uses Rule G interrogatories to go beyond the
 23 25-interrogatory limit set under Rule 33, causing undue burden to Claimant in violation of
 24 the Federal Rules of Civil Procedure and the Local Rules. Even under Rule 26, Responding
 25 Party has no obligation at this early stage of the litigation before fact and expert discovery
 26 have been completed to recite all evidence to support its case. Furthermore, at the
 27 appropriate time, Responding Party reserves its right to invoke the option to produce
 28 documents under Rule 33(d) of the Federal Rules of Civil Procedure, because the answer

1 to an interrogatory such as this may be determined by examining or summarizing
2 Responding Party's documents and the burden of deriving or ascertaining the answer will
3 be substantially the same for either party. Responding Party objects further that this
4 Interrogatory seeks information that is already in the possession of, or is equally available
5 to, Propounding Party. This Interrogatory therefore imposes an undue burden on
6 Responding Party.

7 Investigation is continuing and Rule 26 discovery has not commenced. Responding
8 Party reserves the right to supplement and/or amend this Response.

9 **SPECIAL INTERROGATORY NO. 13:**

10 Identify all witnesses, including the names, addresses, and telephone numbers of
11 such witnesses, to the assertion in paragraph 5 of your claim that you held 245.98124 BTC
12 at the Mt. Gox Exchange.

13 **RESPONSE TO SPECIAL INTERROGATORY NO. 13:**

14 Responding Party incorporates each of its General Objections set forth above by
15 reference. Responding Party further objects that this Interrogatory is overbroad and is
16 premature because it goes beyond the restricted scope of Rule G interrogatories permitting
17 limited discovery on "claimant's identity and relationship to the defendant property" for
18 purposes of determining standing, which claimant has sufficiently identified. Plaintiff
19 abuses Rule G to conduct one-sided, merits-based discovery that is not yet open under Rule
20 26 and Local Rule 16-7, and impermissibly uses Rule G interrogatories to go beyond the
21 25-interrogatory limit set under Rule 33, causing undue burden to Claimant in violation of
22 the Federal Rules of Civil Procedure and the Local Rules. Even under Rule 26, Responding
23 Party has no obligation at this early stage of the litigation before fact and expert discovery
24 have been completed to recite all evidence and identify every witness, known or unknown
25 to claimant, to support its case. Furthermore, at the appropriate time, Responding Party
26 reserves its right to invoke the option to produce documents under Rule 33(d) of the Federal
27 Rules of Civil Procedure, because the answer to an interrogatory such as this may be
28 determined by examining or summarizing Responding Party's documents and the burden

1 of deriving or ascertaining the answer will be substantially the same for either party.
2 Responding Party objects further that this Interrogatory seeks information that is already
3 in the possession of, or is equally available to, Propounding Party. This Interrogatory
4 therefore imposes an undue burden on Responding Party. Responding Party further objects
5 to the extent this Interrogatory seeks information that would inappropriately invade the
6 privacy.

7 Investigation is continuing and Rule 26 discovery has not commenced. Responding
8 Party reserves the right to supplement and/or amend this Response.

9 **SPECIAL INTERROGATORY NO. 14:**

10 List each and every document evidencing, recording, facilitating, or otherwise
11 supporting the assertion in paragraph 5 of your claim that you held 245.98124 BTC at the
12 Mt. Gox Exchange.

13 **RESPONSE TO SPECIAL INTERROGATORY NO. 14:**

14 Responding Party incorporates each of its General Objections set forth above by
15 reference. Responding Party further objects that this Interrogatory is overbroad and is
16 premature because it goes beyond the restricted scope of Rule G interrogatories permitting
17 limited discovery on “claimant’s identity and relationship to the defendant property” for
18 purposes of determining standing, which claimant has sufficiently identified. Plaintiff
19 abuses Rule G to conduct one-sided, merits-based discovery that is not yet open under Rule
20 26 and Local Rule 16-7, and impermissibly uses Rule G interrogatories to go beyond the
21 25-interrogatory limit set under Rule 33, causing undue burden to Claimant in violation of
22 the Federal Rules of Civil Procedure and the Local Rules. Even under Rule 26, Responding
23 Party has no obligation at this early stage of the litigation before fact and expert discovery
24 have been completed to recite all evidence and identify every witness, known or unknown
25 to claimant, to support its case. Furthermore, at the appropriate time, Responding Party
26 reserves its right to invoke the option to produce documents under Rule 33(d) of the Federal
27 Rules of Civil Procedure, because the answer to an interrogatory such as this may be
28 determined by examining or summarizing Responding Party’s documents and the burden

1 of deriving or ascertaining the answer will be substantially the same for either party.
 2 Responding Party objects further that this Interrogatory seeks information that is already
 3 in the possession of, or is equally available to, Propounding Party. This Interrogatory
 4 therefore imposes an undue burden on Responding Party. Responding Party further objects
 5 to the extent this Interrogatory seeks information that would inappropriately invade the
 6 privacy.

7 Investigation is continuing and Rule 26 discovery has not commenced. Responding
 8 Party reserves the right to supplement and/or amend this Response.

9 **SPECIAL INTERROGATORY NO. 15:**

10 Identify all witnesses, including the names, addresses, and telephone numbers of
 11 such witnesses, to the assertion in paragraphs 2 and 6 of your claim that the hacked Bitcoins
 12 from the Mt. Gox Exchange (including those you are claiming) were transferred from Mt.
 13 Gox to Silk Road.

14 **RESPONSE TO SPECIAL INTERROGATORY NO. 15:**

15 Responding Party incorporates each of its General Objections set forth above by
 16 reference. Responding Party further objects that this Interrogatory is overbroad and is
 17 premature because it goes beyond the restricted scope of Rule G interrogatories permitting
 18 limited discovery on “claimant’s identity and relationship to the defendant property” for
 19 purposes of determining standing, which claimant has sufficiently identified. Plaintiff
 20 abuses Rule G to conduct one-sided, merits-based discovery that is not yet open under Rule
 21 26 and Local Rule 16-7, and impermissibly uses Rule G interrogatories to go beyond the
 22 25-interrogatory limit set under Rule 33, causing undue burden to Claimant in violation of
 23 the Federal Rules of Civil Procedure and the Local Rules. Even under Rule 26, Responding
 24 Party has no obligation at this early stage of the litigation before fact and expert discovery
 25 have been completed to recite all evidence and identify every witness, known or unknown
 26 to claimant, to support its case. Furthermore, at the appropriate time, Responding Party
 27 reserves its right to invoke the option to produce documents under Rule 33(d) of the Federal
 28 Rules of Civil Procedure, because the answer to an interrogatory such as this may be

determined by examining or summarizing Responding Party's documents and the burden of deriving or ascertaining the answer will be substantially the same for either party. Responding Party objects further that this Interrogatory seeks information that is already in the possession of, or is equally available to, Propounding Party. This Interrogatory therefore imposes an undue burden on Responding Party. Responding Party further objects to the extent this Interrogatory seeks information that would inappropriately invade the privacy.

Investigation is continuing and Rule 26 discovery has not commenced. Responding Party reserves the right to supplement and/or amend this Response.

SPECIAL INTERROGATORY NO. 16:

List each and every document evidencing, recording, facilitating, or otherwise supporting the assertion in paragraphs 2 and 6 of your claim that the hacked Bitcoins from the Mt. Gox Exchange (including those you are claiming) were transferred from Mt. Gox to Silk Road.

RESPONSE TO SPECIAL INTERROGATORY NO. 16:

Responding Party incorporates each of its General Objections set forth above by reference. Responding Party further objects that this Interrogatory is overbroad and is premature because it goes beyond the restricted scope of Rule G interrogatories permitting limited discovery on "claimant's identity and relationship to the defendant property" for purposes of determining standing, which claimant has sufficiently identified. Plaintiff abuses Rule G to conduct one-sided, merits-based discovery that is not yet open under Rule 26 and Local Rule 16-7, and impermissibly uses Rule G interrogatories to go beyond the 25-interrogatory limit set under Rule 33, causing undue burden to Claimant in violation of the Federal Rules of Civil Procedure and the Local Rules. Even under Rule 26, Responding Party has no obligation at this early stage of the litigation before fact and expert discovery have been completed to recite all evidence and identify every witness, known or unknown to claimant, to support its case. Furthermore, at the appropriate time, Responding Party reserves its right to invoke the option to produce documents under Rule 33(d) of the Federal

Rules of Civil Procedure, because the answer to an interrogatory such as this may be determined by examining or summarizing Responding Party's documents and the burden of deriving or ascertaining the answer will be substantially the same for either party. Responding Party objects further that this Interrogatory seeks information that is already in the possession of, or is equally available to, Propounding Party. This Interrogatory therefore imposes an undue burden on Responding Party. Responding Party further objects to the extent this Interrogatory seeks information that would inappropriately invade the privacy.

Investigation is continuing and Rule 26 discovery has not commenced. Responding Party reserves the right to supplement and/or amend this Response.

SPECIAL INTERROGATORY NO. 17:

List each and every document evidencing, recording, facilitating, or otherwise indicating each transaction you made using your wallet at the Mt. Gox Exchange between March 1, 2012 and April 9, 2013.

RESPONSE TO SPECIAL INTERROGATORY NO. 17:

Responding Party incorporates each of its General Objections set forth above by reference. Responding Party further objects that this Interrogatory is overbroad and is premature because it goes beyond the restricted scope of Rule G interrogatories permitting limited discovery on "claimant's identity and relationship to the defendant property" for purposes of determining standing, which claimant has sufficiently identified. Plaintiff abuses Rule G to conduct one-sided, merits-based discovery that is not yet open under Rule 26 and Local Rule 16-7, and impermissibly uses Rule G interrogatories to go beyond the 25-interrogatory limit set under Rule 33, causing undue burden to Claimant in violation of the Federal Rules of Civil Procedure and the Local Rules. Even under Rule 26, Responding Party has no obligation at this early stage of the litigation before fact and expert discovery have been completed to recite all evidence and identify every witness, known or unknown to claimant, to support its case. Furthermore, at the appropriate time, Responding Party reserves its right to invoke the option to produce documents under Rule 33(d) of the Federal

1 Rules of Civil Procedure, because the answer to an interrogatory such as this may be
2 determined by examining or summarizing Responding Party's documents and the burden
3 of deriving or ascertaining the answer will be substantially the same for either party.
4 Responding Party objects further that this Interrogatory seeks information that is already
5 in the possession of, or is equally available to, Propounding Party. This Interrogatory
6 therefore imposes an undue burden on Responding Party. Responding Party further objects
7 to the extent this Interrogatory seeks information that would inappropriately invade the
8 privacy.

9 Investigation is continuing and Rule 26 discovery has not commenced. Responding
10 Party reserves the right to supplement and/or amend this Response.

11 **SPECIAL INTERROGATORY NO. 18:**

12 Identify all witnesses, including the names, addresses, and telephone numbers of
13 such witnesses, to the assertion in paragraph 4 of your claim that "[o]n or before March 1,
14 2012, you opened an account on the Mt. Gox Exchange and deposited \$2,475 USD to
15 purchase BTC."

16 **RESPONSE TO SPECIAL INTERROGATORY NO. 18:**

17 Responding Party incorporates each of its General Objections set forth above by
18 reference. Responding Party further objects that this Interrogatory is overbroad and is
19 premature because it goes beyond the restricted scope of Rule G interrogatories permitting
20 limited discovery on "claimant's identity and relationship to the defendant property" for
21 purposes of determining standing, which claimant has sufficiently identified. Plaintiff
22 abuses Rule G to conduct one-sided, merits-based discovery that is not yet open under Rule
23 26 and Local Rule 16-7, and impermissibly uses Rule G interrogatories to go beyond the
24 25-interrogatory limit set under Rule 33, causing undue burden to Claimant in violation of
25 the Federal Rules of Civil Procedure and the Local Rules. Even under Rule 26, Responding
26 Party has no obligation at this early stage of the litigation before fact and expert discovery
27 have been completed to recite all evidence and identify every witness, known or unknown
28 to claimant, to support its case. Furthermore, at the appropriate time, Responding Party

1 reserves its right to invoke the option to produce documents under Rule 33(d) of the Federal
 2 Rules of Civil Procedure, because the answer to an interrogatory such as this may be
 3 determined by examining or summarizing Responding Party's documents and the burden
 4 of deriving or ascertaining the answer will be substantially the same for either party.
 5 Responding Party objects further that this Interrogatory seeks information that is already
 6 in the possession of, or is equally available to, Propounding Party. This Interrogatory
 7 therefore imposes an undue burden on Responding Party. Responding Party further objects
 8 to the extent this Interrogatory seeks information that would inappropriately invade the
 9 privacy.

10 Investigation is continuing and Rule 26 discovery has not commenced. Responding
 11 Party reserves the right to supplement and/or amend this Response.

12 **SPECIAL INTERROGATORY NO. 19:**

13 List each and every document evidencing, recording, facilitating, or otherwise
 14 supporting the assertion in paragraph 4 of your claim that "[o]n or before March 1, 2012,
 15 you opened an account on the Mt. Gox Exchange and deposited \$2,475 USD to purchase
 16 BTC."

17 **RESPONSE TO SPECIAL INTERROGATORY NO. 19:**

18 Responding Party incorporates each of its General Objections set forth above by
 19 reference. Responding Party further objects that this Interrogatory is overbroad and is
 20 premature because it goes beyond the restricted scope of Rule G interrogatories permitting
 21 limited discovery on "claimant's identity and relationship to the defendant property" for
 22 purposes of determining standing, which claimant has sufficiently identified. Plaintiff
 23 abuses Rule G to conduct one-sided, merits-based discovery that is not yet open under Rule
 24 26 and Local Rule 16-7, and impermissibly uses Rule G interrogatories to go beyond the
 25 25-interrogatory limit set under Rule 33, causing undue burden to Claimant in violation of
 26 the Federal Rules of Civil Procedure and the Local Rules. Even under Rule 26, Responding
 27 Party has no obligation at this early stage of the litigation before fact and expert discovery
 28 have been completed to recite all evidence and identify every witness, known or unknown

1 to claimant, to support its case. Furthermore, at the appropriate time, Responding Party
2 reserves its right to invoke the option to produce documents under Rule 33(d) of the Federal
3 Rules of Civil Procedure, because the answer to an interrogatory such as this may be
4 determined by examining or summarizing Responding Party's documents and the burden
5 of deriving or ascertaining the answer will be substantially the same for either party.
6 Responding Party objects further that this Interrogatory seeks information that is already
7 in the possession of, or is equally available to, Propounding Party. This Interrogatory
8 therefore imposes an undue burden on Responding Party. Responding Party further objects
9 to the extent this Interrogatory seeks information that would inappropriately invade the
10 privacy.

11 Investigation is continuing and Rule 26 discovery has not commenced. Responding
12 Party reserves the right to supplement and/or amend this Response.

13 **SPECIAL INTERROGATORY NO. 20:**

14 Identify all witnesses, including the names, addresses, and telephone numbers of
15 such witnesses, to the assertion in paragraph 4 of your claim that you purchased BTC on
16 the Mt. Gox Exchange after opening your account in March 2012.

17 **RESPONSE TO SPECIAL INTERROGATORY NO. 20:**

18 Responding Party incorporates each of its General Objections set forth above by
19 reference. Responding Party further objects that this Interrogatory is overbroad and is
20 premature because it goes beyond the restricted scope of Rule G interrogatories permitting
21 limited discovery on "claimant's identity and relationship to the defendant property" for
22 purposes of determining standing, which claimant has sufficiently identified. Plaintiff
23 abuses Rule G to conduct one-sided, merits-based discovery that is not yet open under Rule
24 26 and Local Rule 16-7, and impermissibly uses Rule G interrogatories to go beyond the
25 25-interrogatory limit set under Rule 33, causing undue burden to Claimant in violation of
26 the Federal Rules of Civil Procedure and the Local Rules. Even under Rule 26, Responding
27 Party has no obligation at this early stage of the litigation before fact and expert discovery
28 have been completed to recite all evidence and identify every witness, known or unknown

1 to claimant, to support its case. Furthermore, at the appropriate time, Responding Party
 2 reserves its right to invoke the option to produce documents under Rule 33(d) of the Federal
 3 Rules of Civil Procedure, because the answer to an interrogatory such as this may be
 4 determined by examining or summarizing Responding Party's documents and the burden
 5 of deriving or ascertaining the answer will be substantially the same for either party.
 6 Responding Party objects further that this Interrogatory seeks information that is already
 7 in the possession of, or is equally available to, Propounding Party. This Interrogatory
 8 therefore imposes an undue burden on Responding Party. Responding Party further objects
 9 to the extent this Interrogatory seeks information that would inappropriately invade the
 10 privacy.

11 Investigation is continuing and Rule 26 discovery has not commenced. Responding
 12 Party reserves the right to supplement and/or amend this Response.

13 **SPECIAL INTERROGATORY NO. 21:**

14 List each and every document evidencing, recording, facilitating, or otherwise
 15 supporting the assertion in paragraph 4 of your claim that you purchased BTC on the Mt.
 16 Gox Exchange after opening your account in March 2012.

17 **RESPONSE TO SPECIAL INTERROGATORY NO. 21:**

18 Responding Party incorporates each of its General Objections set forth above by
 19 reference. Responding Party further objects that this Interrogatory is overbroad and is
 20 premature because it goes beyond the restricted scope of Rule G interrogatories permitting
 21 limited discovery on "claimant's identity and relationship to the defendant property" for
 22 purposes of determining standing, which claimant has sufficiently identified. Plaintiff
 23 abuses Rule G to conduct one-sided, merits-based discovery that is not yet open under Rule
 24 26 and Local Rule 16-7, and impermissibly uses Rule G interrogatories to go beyond the
 25 25-interrogatory limit set under Rule 33, causing undue burden to Claimant in violation of
 26 the Federal Rules of Civil Procedure and the Local Rules. Even under Rule 26, Responding
 27 Party has no obligation at this early stage of the litigation before fact and expert discovery
 28 have been completed to recite all evidence and identify every witness, known or unknown

1 to claimant, to support its case. Furthermore, at the appropriate time, Responding Party
2 reserves its right to invoke the option to produce documents under Rule 33(d) of the Federal
3 Rules of Civil Procedure, because the answer to an interrogatory such as this may be
4 determined by examining or summarizing Responding Party's documents and the burden
5 of deriving or ascertaining the answer will be substantially the same for either party.
6 Responding Party objects further that this Interrogatory seeks information that is already
7 in the possession of, or is equally available to, Propounding Party. This Interrogatory
8 therefore imposes an undue burden on Responding Party. Responding Party further objects
9 to the extent this Interrogatory seeks information that would inappropriately invade the
10 privacy.

11 Investigation is continuing and Rule 26 discovery has not commenced. Responding
12 Party reserves the right to supplement and/or amend this Response.

13 **SPECIAL INTERROGATORY NO. 22:**

14 List each and every document evidencing, recording, facilitating, or otherwise
15 relating to any transaction identified in response to Special Interrogatory No. 4.

16 **RESPONSE TO SPECIAL INTERROGATORY NO. 22:**

17 Responding Party incorporates each of its General Objections set forth above by
18 reference. Responding Party further objects that this Interrogatory is overbroad and is
19 premature because it goes beyond the restricted scope of Rule G interrogatories permitting
20 limited discovery on "claimant's identity and relationship to the defendant property" for
21 purposes of determining standing, which claimant has sufficiently identified. Plaintiff
22 abuses Rule G to conduct one-sided, merits-based discovery that is not yet open under Rule
23 26 and Local Rule 16-7, and impermissibly uses Rule G interrogatories to go beyond the
24 25-interrogatory limit set under Rule 33, causing undue burden to Claimant in violation of
25 the Federal Rules of Civil Procedure and the Local Rules. Even under Rule 26, Responding
26 Party has no obligation at this early stage of the litigation before fact and expert discovery
27 have been completed to recite all evidence and identify every witness, known or unknown
28 to claimant, to support its case. Furthermore, at the appropriate time, Responding Party

1 reserves its right to invoke the option to produce documents under Rule 33(d) of the Federal
2 Rules of Civil Procedure, because the answer to an interrogatory such as this may be
3 determined by examining or summarizing Responding Party's documents and the burden
4 of deriving or ascertaining the answer will be substantially the same for either party.
5 Responding Party objects further that this Interrogatory seeks information that is already
6 in the possession of, or is equally available to, Propounding Party. This Interrogatory
7 therefore imposes an undue burden on Responding Party. Responding Party further objects
8 to the extent this Interrogatory seeks information that would inappropriately invade the
9 privacy.

10 Investigation is continuing and Rule 26 discovery has not commenced. Responding
11 Party reserves the right to supplement and/or amend this Response.

12 **SPECIAL INTERROGATORY NO. 23:**

13 List each and every document evidencing, recording, facilitating, or otherwise
14 relating to your answer in response to Special Interrogatory No. 4.

15 **RESPONSE TO SPECIAL INTERROGATORY NO. 23:**

16 Responding Party incorporates each of its General Objections set forth above by
17 reference. Responding Party further objects that this Interrogatory is overbroad and is
18 premature because it goes beyond the restricted scope of Rule G interrogatories permitting
19 limited discovery on "claimant's identity and relationship to the defendant property" for
20 purposes of determining standing, which claimant has sufficiently identified. Plaintiff
21 abuses Rule G to conduct one-sided, merits-based discovery that is not yet open under Rule
22 26 and Local Rule 16-7, and impermissibly uses Rule G interrogatories to go beyond the
23 25-interrogatory limit set under Rule 33, causing undue burden to Claimant in violation of
24 the Federal Rules of Civil Procedure and the Local Rules. Even under Rule 26, Responding
25 Party has no obligation at this early stage of the litigation before fact and expert discovery
26 have been completed to recite all evidence and identify every witness, known or unknown
27 to claimant, to support its case. Furthermore, at the appropriate time, Responding Party
28 reserves its right to invoke the option to produce documents under Rule 33(d) of the Federal

Rules of Civil Procedure, because the answer to an interrogatory such as this may be determined by examining or summarizing Responding Party's documents and the burden of deriving or ascertaining the answer will be substantially the same for either party. Responding Party objects further that this Interrogatory seeks information that is already in the possession of, or is equally available to, Propounding Party. This Interrogatory therefore imposes an undue burden on Responding Party. Responding Party further objects to the extent this Interrogatory seeks information that would inappropriately invade the privacy. Responding Party further objects to this Interrogatory as being cumulative.

Investigation is continuing and Rule 26 discovery has not commenced. Responding Party reserves the right to supplement and/or amend this Response.

SPECIAL INTERROGATORY NO. 24:

List each and every document evidencing, recording, facilitating, or otherwise relating to your answer in response to Special Interrogatory No. 5.

RESPONSE TO SPECIAL INTERROGATORY NO. 24:

Responding Party incorporates each of its General Objections set forth above by reference. Responding Party further objects that this Interrogatory is overbroad and is premature because it goes beyond the restricted scope of Rule G interrogatories permitting limited discovery on "claimant's identity and relationship to the defendant property" for purposes of determining standing, which claimant has sufficiently identified. Plaintiff abuses Rule G to conduct one-sided, merits-based discovery that is not yet open under Rule 26 and Local Rule 16-7, and impermissibly uses Rule G interrogatories to go beyond the 25-interrogatory limit set under Rule 33, causing undue burden to Claimant in violation of the Federal Rules of Civil Procedure and the Local Rules. Even under Rule 26, Responding Party has no obligation at this early stage of the litigation before fact and expert discovery have been completed to recite all evidence and identify every witness, known or unknown to claimant, to support its case. Furthermore, at the appropriate time, Responding Party reserves its right to invoke the option to produce documents under Rule 33(d) of the Federal Rules of Civil Procedure, because the answer to an interrogatory such as this may be

1 determined by examining or summarizing Responding Party's documents and the burden
2 of deriving or ascertaining the answer will be substantially the same for either party.
3 Responding Party objects further that this Interrogatory seeks information that is already
4 in the possession of, or is equally available to, Propounding Party. This Interrogatory
5 therefore imposes an undue burden on Responding Party. Responding Party further objects
6 to the extent this Interrogatory seeks information that would inappropriately invade the
7 privacy.

8 Investigation is continuing and Rule 26 discovery has not commenced. Responding
9 Party reserves the right to supplement and/or amend this Response.

10 **SPECIAL INTERROGATORY NO. 25:**

11 List each and every document evidencing, recording, facilitating, or otherwise
12 relating to your answer in response to Special Interrogatory No. 6.

13 **RESPONSE TO SPECIAL INTERROGATORY NO. 25:**

14 Responding Party incorporates each of its General Objections set forth above by
15 reference. Responding Party further objects that this Interrogatory is overbroad and is
16 premature because it goes beyond the restricted scope of Rule G interrogatories permitting
17 limited discovery on "claimant's identity and relationship to the defendant property" for
18 purposes of determining standing, which claimant has sufficiently identified. Plaintiff
19 abuses Rule G to conduct one-sided, merits-based discovery that is not yet open under Rule
20 26 and Local Rule 16-7, and impermissibly uses Rule G interrogatories to go beyond the
21 25-interrogatory limit set under Rule 33, causing undue burden to Claimant in violation of
22 the Federal Rules of Civil Procedure and the Local Rules. Even under Rule 26, Responding
23 Party has no obligation at this early stage of the litigation before fact and expert discovery
24 have been completed to recite all evidence and identify every witness, known or unknown
25 to claimant, to support its case. Furthermore, at the appropriate time, Responding Party
26 reserves its right to invoke the option to produce documents under Rule 33(d) of the Federal
27 Rules of Civil Procedure, because the answer to an interrogatory such as this may be
28 determined by examining or summarizing Responding Party's documents and the burden

1 of deriving or ascertaining the answer will be substantially the same for either party.
 2 Responding Party objects further that this Interrogatory seeks information that is already
 3 in the possession of, or is equally available to, Propounding Party. This Interrogatory
 4 therefore imposes an undue burden on Responding Party. Responding Party further objects
 5 to the extent this Interrogatory seeks information that would inappropriately invade the
 6 privacy.

7 Investigation is continuing and Rule 26 discovery has not commenced. Responding
 8 Party reserves the right to supplement and/or amend this Response.

9 **SPECIAL INTERROGATORY NO. 26:**

10 List each and every document evidencing, recording, facilitating, or otherwise
 11 relating to your answer in response to Special Interrogatory No. 7.

12 **RESPONSE TO SPECIAL INTERROGATORY NO. 26:**

13 Responding Party incorporates each of its General Objections set forth above by
 14 reference. Responding Party further objects that this Interrogatory is overbroad and is
 15 premature because it goes beyond the restricted scope of Rule G interrogatories permitting
 16 limited discovery on “claimant’s identity and relationship to the defendant property” for
 17 purposes of determining standing, which claimant has sufficiently identified. Plaintiff
 18 abuses Rule G to conduct one-sided, merits-based discovery that is not yet open under Rule
 19 26 and Local Rule 16-7, and impermissibly uses Rule G interrogatories to go beyond the
 20 25-interrogatory limit set under Rule 33, causing undue burden to Claimant in violation of
 21 the Federal Rules of Civil Procedure and the Local Rules. Even under Rule 26, Responding
 22 Party has no obligation at this early stage of the litigation before fact and expert discovery
 23 have been completed to recite all evidence and identify every witness, known or unknown
 24 to claimant, to support its case. Furthermore, at the appropriate time, Responding Party
 25 reserves its right to invoke the option to produce documents under Rule 33(d) of the Federal
 26 Rules of Civil Procedure, because the answer to an interrogatory such as this may be
 27 determined by examining or summarizing Responding Party’s documents and the burden
 28 of deriving or ascertaining the answer will be substantially the same for either party.

1 Responding Party objects further that this Interrogatory seeks information that is already
 2 in the possession of, or is equally available to, Propounding Party. This Interrogatory
 3 therefore imposes an undue burden on Responding Party. Responding Party further objects
 4 to the extent this Interrogatory seeks information that would inappropriately invade the
 5 privacy.

6 Investigation is continuing and Rule 26 discovery has not commenced. Responding
 7 Party reserves the right to supplement and/or amend this Response.

8 **SPECIAL INTERROGATORY NO. 27:**

9 List each and every document evidencing, recording, facilitating, or otherwise
 10 relating to your answer in response to Special Interrogatory No. 8.

11 **RESPONSE TO SPECIAL INTERROGATORY NO. 27:**

12 Responding Party incorporates each of its General Objections set forth above by
 13 reference. Responding Party further objects that this Interrogatory is overbroad and is
 14 premature because it goes beyond the restricted scope of Rule G interrogatories permitting
 15 limited discovery on “claimant’s identity and relationship to the defendant property” for
 16 purposes of determining standing, which claimant has sufficiently identified. Plaintiff
 17 abuses Rule G to conduct one-sided, merits-based discovery that is not yet open under Rule
 18 26 and Local Rule 16-7, and impermissibly uses Rule G interrogatories to go beyond the
 19 25-interrogatory limit set under Rule 33, causing undue burden to Claimant in violation of
 20 the Federal Rules of Civil Procedure and the Local Rules. Even under Rule 26, Responding
 21 Party has no obligation at this early stage of the litigation before fact and expert discovery
 22 have been completed to recite all evidence and identify every witness, known or unknown
 23 to claimant, to support its case. Furthermore, at the appropriate time, Responding Party
 24 reserves its right to invoke the option to produce documents under Rule 33(d) of the Federal
 25 Rules of Civil Procedure, because the answer to an interrogatory such as this may be
 26 determined by examining or summarizing Responding Party’s documents and the burden
 27 of deriving or ascertaining the answer will be substantially the same for either party.
 28 Responding Party objects further that this Interrogatory seeks information that is already

1 in the possession of, or is equally available to, Propounding Party. This Interrogatory
 2 therefore imposes an undue burden on Responding Party. Responding Party further objects
 3 to the extent this Interrogatory seeks information that would inappropriately invade the
 4 privacy.

5 Investigation is continuing and Rule 26 discovery has not commenced. Responding
 6 Party reserves the right to supplement and/or amend this Response.

7 **SPECIAL INTERROGATORY NO. 28:**

8 List each and every document evidencing, recording, facilitating, or otherwise
 9 relating to your answer in response to Special Interrogatory No. 9.

10 **RESPONSE TO SPECIAL INTERROGATORY NO. 28:**

11 Responding Party incorporates each of its General Objections set forth above by
 12 reference. Responding Party further objects that this Interrogatory is overbroad and is
 13 premature because it goes beyond the restricted scope of Rule G interrogatories permitting
 14 limited discovery on “claimant’s identity and relationship to the defendant property” for
 15 purposes of determining standing, which claimant has sufficiently identified. Plaintiff
 16 abuses Rule G to conduct one-sided, merits-based discovery that is not yet open under Rule
 17 26 and Local Rule 16-7, and impermissibly uses Rule G interrogatories to go beyond the
 18 25-interrogatory limit set under Rule 33, causing undue burden to Claimant in violation of
 19 the Federal Rules of Civil Procedure and the Local Rules. Even under Rule 26, Responding
 20 Party has no obligation at this early stage of the litigation before fact and expert discovery
 21 have been completed to recite all evidence and identify every witness, known or unknown
 22 to claimant, to support its case. Furthermore, at the appropriate time, Responding Party
 23 reserves its right to invoke the option to produce documents under Rule 33(d) of the Federal
 24 Rules of Civil Procedure, because the answer to an interrogatory such as this may be
 25 determined by examining or summarizing Responding Party’s documents and the burden
 26 of deriving or ascertaining the answer will be substantially the same for either party.
 27 Responding Party objects further that this Interrogatory seeks information that is already
 28 in the possession of, or is equally available to, Propounding Party. This Interrogatory

1 therefore imposes an undue burden on Responding Party. Responding Party further objects
2 to the extent this Interrogatory seeks information that would inappropriately invade the
3 privacy.

4 Investigation is continuing and Rule 26 discovery has not commenced. Responding
5 Party reserves the right to supplement and/or amend this Response.

6 **SPECIAL INTERROGATORY NO. 29:**

7 List each and every document evidencing, recording, facilitating, or otherwise
8 relating to your answer in response to Special Interrogatory No. 10.

9 **RESPONSE TO SPECIAL INTERROGATORY NO. 29:**

10 Responding Party incorporates each of its General Objections set forth above by
11 reference. Responding Party further objects that this Interrogatory is overbroad and is
12 premature because it goes beyond the restricted scope of Rule G interrogatories permitting
13 limited discovery on “claimant’s identity and relationship to the defendant property” for
14 purposes of determining standing, which claimant has sufficiently identified. Plaintiff
15 abuses Rule G to conduct one-sided, merits-based discovery that is not yet open under Rule
16 26 and Local Rule 16-7, and impermissibly uses Rule G interrogatories to go beyond the
17 25-interrogatory limit set under Rule 33, causing undue burden to Claimant in violation of
18 the Federal Rules of Civil Procedure and the Local Rules. Even under Rule 26, Responding
19 Party has no obligation at this early stage of the litigation before fact and expert discovery
20 have been completed to recite all evidence and identify every witness, known or unknown
21 to claimant, to support its case. Furthermore, at the appropriate time, Responding Party
22 reserves its right to invoke the option to produce documents under Rule 33(d) of the Federal
23 Rules of Civil Procedure, because the answer to an interrogatory such as this may be
24 determined by examining or summarizing Responding Party’s documents and the burden
25 of deriving or ascertaining the answer will be substantially the same for either party.
26 Responding Party objects further that this Interrogatory seeks information that is already
27 in the possession of, or is equally available to, Propounding Party. This Interrogatory
28 therefore imposes an undue burden on Responding Party. Responding Party further objects

1 to the extent this Interrogatory seeks information that would inappropriately invade the
2 privacy.

3 Investigation is continuing and Rule 26 discovery has not commenced. Responding
4 Party reserves the right to supplement and/or amend this Response.

5 **SPECIAL INTERROGATORY NO. 30:**

6 List each and every document evidencing, recording, facilitating, or otherwise
7 relating to any transaction identified in response to Special Interrogatory No. 11.

8 **RESPONSE TO SPECIAL INTERROGATORY NO. 30:**

9 Responding Party incorporates each of its General Objections set forth above by
10 reference. Responding Party further objects that this Interrogatory is overbroad and is
11 premature because it goes beyond the restricted scope of Rule G interrogatories permitting
12 limited discovery on “claimant’s identity and relationship to the defendant property” for
13 purposes of determining standing, which claimant has sufficiently identified. Plaintiff
14 abuses Rule G to conduct one-sided, merits-based discovery that is not yet open under Rule
15 26 and Local Rule 16-7, and impermissibly uses Rule G interrogatories to go beyond the
16 25-interrogatory limit set under Rule 33, causing undue burden to Claimant in violation of
17 the Federal Rules of Civil Procedure and the Local Rules. Even under Rule 26, Responding
18 Party has no obligation at this early stage of the litigation before fact and expert discovery
19 have been completed to recite all evidence and identify every witness, known or unknown
20 to claimant, to support its case. Furthermore, at the appropriate time, Responding Party
21 reserves its right to invoke the option to produce documents under Rule 33(d) of the Federal
22 Rules of Civil Procedure, because the answer to an interrogatory such as this may be
23 determined by examining or summarizing Responding Party’s documents and the burden
24 of deriving or ascertaining the answer will be substantially the same for either party.
25 Responding Party objects further that this Interrogatory seeks information that is already
26 in the possession of, or is equally available to, Propounding Party. This Interrogatory
27 therefore imposes an undue burden on Responding Party. Responding Party further objects
28 to the extent this Interrogatory seeks information that would inappropriately invade the

1 privacy.

2 Investigation is continuing and Rule 26 discovery has not commenced. Responding
3 Party reserves the right to supplement and/or amend this Response.

4 **INTERROGATORY NO. 31:**

5 List each and every document evidencing, recording, facilitating, or otherwise
6 relating to any transaction identified in response to Special Interrogatory No. 12.

7 **RESPONSE TO INTERROGATORY NO. 31:**

8 Responding Party incorporates each of its General Objections set forth above by
9 reference. Responding Party further objects that this Interrogatory is overbroad and is
10 premature because it goes beyond the restricted scope of Rule G interrogatories permitting
11 limited discovery on “claimant’s identity and relationship to the defendant property” for
12 purposes of determining standing, which claimant has sufficiently identified. Plaintiff
13 abuses Rule G to conduct one-sided, merits-based discovery that is not yet open under Rule
14 26 and Local Rule 16-7, and impermissibly uses Rule G interrogatories to go beyond the
15 25-interrogatory limit set under Rule 33, causing undue burden to Claimant in violation of
16 the Federal Rules of Civil Procedure and the Local Rules. Even under Rule 26, Responding
17 Party has no obligation at this early stage of the litigation before fact and expert discovery
18 have been completed to recite all evidence and identify every witness, known or unknown
19 to claimant, to support its case. Furthermore, at the appropriate time, Responding Party
20 reserves its right to invoke the option to produce documents under Rule 33(d) of the Federal
21 Rules of Civil Procedure, because the answer to an interrogatory such as this may be
22 determined by examining or summarizing Responding Party’s documents and the burden
23 of deriving or ascertaining the answer will be substantially the same for either party.
24 Responding Party objects further that this Interrogatory seeks information that is already
25 in the possession of, or is equally available to, Propounding Party. This Interrogatory
26 therefore imposes an undue burden on Responding Party. Responding Party further objects
27 to the extent this Interrogatory seeks information that would inappropriately invade the
28 privacy.

1 Investigation is continuing and Rule 26 discovery has not commenced. Responding
2 Party reserves the right to supplement and/or amend this Response.

3
4 Dated: March 25, 2021

ALMADANI LAW

5 By: /s/ Yasin M. Almadani
6 Yasin M. Almadani, Esq.

7 *Attorney for Claimant*
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VERIFICATION

I, ROMAN HOSSAIN, have read the foregoing Rule G(6) interrogatory responses, set one. I believe, based on a reasonable inquiry and investigation, that the responses are true and correct to the best of my knowledge and information and belief. I do not necessarily have personal knowledge regarding each specific response, but I am informed and believe that the responses are true and correct as of the date of these responses.

I verify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: March 25, 2021



ROMAN HOSSAIN
Claimant

PROOF OF SERVICE

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is as follows: Almadani Law, 4695 MacArthur Ct., Suite 1100, Newport Beach, California 92660. On **March 25, 2021**, I served the document(s) listed immediately below on each person(s) and/or entity(ies) named below by causing the document(s) to be mailed, hand-delivered, e-mailed, or faxed, as indicated herein:

CLAIMANT ROMAN HOSSAIN'S OBJECTIONS AND RESPONSES TO PLAINTIFF UNITED STATES OF AMERICA'S SPECIAL INTERROGATORIES TO CLAIMANT ROMAN HOSSAIN PURSUANT TO RULE G (SET ONE)

Person(s) and/or entity(ies) to whom/which the above document(s) were served:

- | | |
|---|--|
| <input type="checkbox"/> BY MAIL | I caused such envelope with postage fully prepaid thereon to be placed in the United States Mail within Los Angeles County to the follow addresses: see attached service list |
| <input type="checkbox"/> BY OVERNIGHT MAIL | I caused such document(s) to be placed in a box or other facility regularly maintained by an express mail carrier, in an envelope designated by such carrier with delivery fees fully prepaid thereon, or provided for, addressed to the person on whom it is to be served, within Los Angeles County. |
| <input type="checkbox"/> BY FACSIMILE | I caused such document(s) to be faxed to the following number(s): |
| <input type="checkbox"/> BY HAND-DELIVERY | I caused such document(s) to be delivered by hand to each person(s) and/or entity(ies) named above. |
| <input checked="" type="checkbox"/> BY E-MAIL | I caused such document(s) to be electronically transmitted to the following e-mail address(es): See Service List |

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on **March 25, 2021**, at La Mirada, California.



Yasin M. Almadani, Esq.

Electronic Service List

<u>Name of Person Served</u>	<u>Party Represented</u>	<u>Service Address</u>
David Countryman Chris Kaltsas	Plaintiff United States of America	David.Countryman@usdoj.gov Chris.Kaltsas2@usdoj.gov
Maxim Price	Claimant Lucas E. Buckley	MPrice@hechtpartners.com

Exhibit 3

From: [Countryman, David \(USACAN\)](#)
To: [Yasin Almadani](#)
Cc: [Maxim Price](#); [Kaltsas, Chris \(USACAN\)](#); [Quiroz, Claudia \(USACAN\)](#)
Subject: RE: Service of Discovery Response
Date: Friday, March 26, 2021 1:00:38 PM

Mr. Almadani,

I reviewed your responses to our Special Interrogatories Set One, and I am confused as to why you objected to and refused to answer questions about (1): your client's alleged account information at Mt. Gox or (2) your assertion that those Bitcoins were stolen and are now contained in the defendant property.

For example, Interrogatory 12 asked for "the name, account number, email address, and any other identifier associated with the account or accounts held by you at the Mt. Gox Exchange from which the Bitcoins you are claiming were allegedly stolen." Your response consisted entirely of objections, including that providing the account information for your allegedly stolen Mt. Gox accounts would be unduly burdensome and outside the scope of identifying your relationship to the defendant property.

However, it is unclear how these objections are applicable or why you are objecting to providing this information. In paragraph 5 of your claim you asserted that you held 245.98124 BTC at the Mt. Gox Exchange. In paragraphs 2 and 6 of your claim you asserted that the hacked Bitcoins from the Mt. Gox Exchange (including those you are claiming) were transferred from Mt. Gox to Silk Road. As such determining what accounts you had at Mt. Gox and following the blockchain to determine where those Bitcoin went and if they are a portion of the defendant property is integral to identifying your relationship to the defendant property.

Similarly, Interrogatories 13 and 14 asked for evidence "supporting the assertion in paragraph 5 of your claim that you held 245.98124 BTC at the Mt. Gox Exchange." You refused to answer this question and provided boilerplate objections.

Interrogatories 15 and 16 asked for evidence "supporting the assertion in paragraphs 2 and 6 of your claim that the hacked Bitcoins from the Mt. Gox Exchange (including those you are claiming) were transferred from Mt. Gox to Silk Road." Again, you refused to answer and provided boilerplate objections.

These questions go to the heart of any alleged ownership interest you have in the defendant property, and I don't understand how providing this information is either overly burdensome or outside the scope of identifying your relationship to the defendant property. As such, I am requesting that you provide complete answers to all of the government's interrogatories no later than Friday, April 2, 2021.

Sincerely,

David Countryman

Assistant U.S. Attorney
Northern District of California
450 Golden Gate Ave., 9th Floor
San Francisco, CA 94102
(415) 436-7303 voice
(415) 436-7234 fax

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From: Yasin Almadani <yma@lawalm.com>
Sent: Thursday, March 25, 2021 5:48 PM
To: Countryman, David (USACAN) <dcountryman@usa.doj.gov>; Kaltsas, Chris (USACAN) <CKaltsas1@usa.doj.gov>; Maxim Price <mprice@hechtpartners.com>
Subject: Service of Discovery Response

Dear Counsel,

Please see attached service of the following discovery responses:

CLAIMANT ROMAN HOSSAIN'S OBJECTIONS AND RESPONSES TO PLAINTIFF UNITED STATES OF AMERICA'S SPECIAL INTERROGATORIES TO CLAIMANT ROMAN HOSSAIN PURSUANT TO RULE G (SET ONE)

Thanks,

Yasin M. Almadani | **Attorney at Law**

ALMADANI LAW

4695 MacArthur Ct., Suite 1100
Newport Beach, CA 92660
Tel: [\(213\) 335-3935](tel:(213)335-3935) | Fax: [\(213\) 296-6278](tel:(213)296-6278)
Email: YMA@LawAlm.com | Website: www.LawAlm.com

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delete this e-mail from your system. Thank you for your cooperation.

Exhibit 4



ALMADANI LAW

YASIN M. ALMADANI
ATTORNEY AT LAW
4695 MACARTHUR CT., STE. 1100
NEWPORT BEACH, CA 92660
TEL: (949) 877-7177
FAX: (949) 877-8757
YMA@LAWALM.COM

April 4, 2021

David Countryman
Chris Kaltsas
Claudia Quiroz
Assistant U.S. Attorneys
Northern District of California
450 Golden Gate Ave., 9th Floor
San Francisco, CA 94102
(415) 436-7303 voice
(415) 436-7234 fax
David.Countryman@usdoj.gov
Chris.Kaltsas2@usdoj.gov
Claudia.Quiroz@usdoj.gov

RE: *U.S. v. Approximately 69,370 Bitcoin (BTC), Bitcoin Gold (BTG), Bitcoin SV (BSV), and Bitcoin Cash (BCH) seized from 1HQ3Go3ggs8pFnXuHVHRytPCq5fGG 8Hbhx*, Case No. 2:20-cv-7811-RS:
Letter Responding to Email on March 26, 2021

Dear Mr. Countryman:

We hope all is well with you and write this letter in response to your email on March 26, 2021. We believe we have a valid claim and a due process right that all sides play by the same rules. It seems the government seeks special treatment.

Before the commencement of discovery, the government served an abusive 31 interrogatories on Claimant Roman Hossain that go far beyond the scope of Rule G(6) of the Supplemental Rule for Admiralty or Maritime Claims, which allows for discovery limited to a “claimant’s identity and relationship to the defendant property.” *Id.* As courts have explained: “These interrogatories are ‘special’ in the sense that they may address only that subject,” and “[t]he objective . . . is to ensure that the Government may challenge the **standing** of the claimant before the court decides a motion to dismiss” *United States v. \$128,915.00 in United States Currency*, No. 20-CV-00667-JPG, 2021 U.S. Dist. LEXIS 13008, at *11 (S.D. Ill. Jan. 25, 2021) (citing 12 Charles Alan Wright & Arthur R. Miller, Federal Practice and Procedure § 3266 (3d ed. 2020)) (emphasis in original).



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However, the government cannot abuse Rule G(6) to conduct early discovery on the actual proof of the claims. *United States v. One Hundred One Thousand & 00/100 Dollars in United States Currency*, No. 10-4047, 2011 U.S. Dist. LEXIS 90196, at *13 (C.D. Ill. Aug. 12, 2011) (denying motion to compel responses to interrogatories because they sought “more than a fuller description of the claimants’ interests in the currency; they sought actual proof of the claims,” which the Court found was “unnecessary at this early stage.”); *see also, e.g., United States v. 370 Units of Hardware*, No. 2:15-cv-02360-JPM-tmp, 2016 U.S. Dist. LEXIS 33779, at *16 (W.D. Tenn. Mar. 16, 2016) (the government cannot use special interrogatories to take discovery beyond the scope of Rule G(6)); *United States v. 50 Riverside Boulevard*, Civ. A. 18-9293 (MCA), 2019 U.S. Dist. LEXIS 172115, at *12 (D.N.J. Oct. 2, 2019) (same); *United States v. Funds in the Amount of \$239,400*, 70 F. Supp. 3d 928, 935 (N.D. Ill. 2014) (same); *United States v. \$133,420.00 in United States Currency*, 672 F.3d 629, 643 n.5 (9th Cir. 2012) (finding special interrogatory requiring the claimant to explain “why anyone would travel anywhere with more than \$133,420 in U.S. currency in a rented vehicle” to be beyond the scope of Rule G(6)(a)); *United States v. Two Hundred Seventy-Two Thousand Dollars*, No. 1:16-cv-06564 (AMD), 2017 U.S. Dist. LEXIS 224211, at *4 (E.D.N.Y. Oct. 26, 2017) (denying motion to compel response to special interrogatory asking “the purpose of transporting the Defendant Funds from Flushing, New York (or elsewhere), to Jericho, New York” and “why the Defendant Funds were transported in the manner in which they were transported, and why the currency was transported in lieu of using cash and/or wire transfers”).

Most of the government’s 31 interrogatories are abusive in that the government has attempted to conduct one-sided, merits-based discovery requiring Plaintiff to provide proof of its case before discovery has even commenced. The government also impermissibly uses Rule G(6) to go beyond the 25-interrogatory limit set by Rule 33, causing undue burden to Claimant in violation of the Federal Rules of Civil Procedure and the Local Rules. As you will note, the Interrogatories themselves state that they are served under not only Rule G(6), but also under Rules 26 and 33 of the Federal Rules of Civil Procedure when the Court clearly has not opened such discovery under Rule 16-7 of the Local Rules. Claimant’s responses to the government’s special interrogatories were thoughtful, factual, and complete, and Claimant has met his obligation under Rule G(6) provide information on his identity and relationship to the defendant property sufficient to establish his standing.



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Indeed, Claimant provided his names and aliases, social security number, and status, and additionally provided a detailed description of his innocent ownership interests and how he came to acquire them, as follows:

Responding Party believes Responding Party is the original, rightful, and innocent owner of at least 245.92 of the 69,370 Bitcoin (“BTC”) seized by the government from Blockchain address 1HQ3Go3ggs8pFnXuHVHRytPCq5fGG8Hbhx (the “1HQ3” wallet) that is the subject of this forfeiture action. The BTC belonging to Responding Party was held by Responding Party at the Mt. Gox Exchange, from where it was stolen by hackers and transferred to Silk Road, and stolen again and transferred to the 1HQ3 wallet, from which it was seized by the government.

The Mt. Gox Exchange website was a website on the worldwide web on which the public could openly and legitimately purchase BTC. Many people did so for investment purposes hoping for appreciation over time. On or before March 1, 2012, Responding Party opened an account on the Mt. Gox Exchange and deposited \$2,475 USD to purchase BTC with the hope that Responding Party’s BTC investment would appreciate over time. Responding Party thereafter openly and legitimately purchased BTC on the Mt. Gox Exchange for investment purposes, and for no unlawful purpose. During this time, Responding Party graduated from the University of California, Irvine, Paul Merage School of Business with an MBA and was awaiting matriculation to law school. Responding Party’s Mt. Gox account balance at the time hackers were stealing BTC from Mt. Gox was 245.98124 BTC, and at least 245.92 BTC was stolen from Responding Party.

Based on information and belief, between 2011 and 2014, the Mt. Gox Exchange experienced several hacks, which resulted in the theft of significant BTC that ended



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up in Silk Road, from where it was stolen again and transferred to the 1HQ3 wallet as follows: Between May 5, 2012 and April 9, 2013, BTC wallets with Blockchain addresses 1BBqjKsYuLEUE9Y5WzdbzCtYzCiQgHqtPN (the “1BB wallet”) and 1BADznNF3W1gi47R65MQs754KB7zTaGuYZ (the “1BAD wallet”) received approximately 47,599 BTC and 22,813 BTC, respectively, stolen from Silk Road (*see* First Am Compl. ¶¶ 15-16); these transfers contained mostly, if not entirely, the BTC that was stolen from Mt. Gox Exchange by hackers, which Responding Party believes included Responding Party’s BTC. On April 9, 2013, the stolen BTC was transferred from the 1BB and 1BAD wallets to the 1HQ3 wallet from which it was seized by the government and is the subject of this forfeiture action. (*Id.* at ¶¶ 18-19, 23.) Responding Party believes that the BTC in the government’s possession thus contains the BTC that was stolen from Responding Party, a fact that Mt. Gox actively concealed from Responding Party, as explained further below.

Based on information and belief, between 2011 and 2014, Mt. Gox was actively concealing the fact that its accounts were being hacked and customers’ BTC was being stolen and placed into Silk Road. In other words, Mt. Gox ledgers were not accurate, and customers were being deceived with ledgers showing BTC that had been stolen and was gone. Indeed, Mark Marie Robert Karpelès, the former CEO of Mt. Gox Exchange, was prosecuted and found guilty by the Tokyo District Court of falsifying data to inflate Mt. Gox’s holdings by \$33.5 million to its account holders. The Japanese court found that Karpelès had inflicted massive harm to the trust of his users. Any usage or transfer of the BTC that was stolen from Responding Party by hackers was done without Responding Party’s knowledge or consent.



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Of the BTC that this the subject of this forfeiture action, Responding Party believes that Responding Party is an innocent owner of at least 245.92 BTC (and all associated past and future BTC forks, including but not limited to BTG, BSV, BCH, etc.), and Responding Party's interest predates and supersedes the government's forfeiture claim. Based on the foregoing, the 245.92 BTC that is the subject of this claim should not be forfeited but returned to Responding Party.

We believe we have provided more than sufficient responsive information on the issues of Claimant's identity and interest in the defendant property to establish standing. The government's attempt to go beyond the limited scope of Rule G(6) to conduct early discovery on the actual proof of the claim is not appropriate. *See One Hundred One Thousand & 00/100 Dollars in United States Currency*, U.S. Dist. LEXIS 90196, at *13 (denying motion to compel responses to interrogatories because they sought "more than a fuller description of the claimants' interests in the currency; they sought actual proof of the claims," which the Court found was "unnecessary at this early stage."). Once discovery is mutually open under Local Rule 16-7, Claimant will respond to appropriate discovery requests served under the Federal Rules of Civil Procedure.

If you would like to discuss this matter further pursuant to Local Rule 1-5(n) and 37-1, I am available on April 7, 2021, at 3:00 p.m. I am in depositions the rest of the week and am in trial the following week. My next availability would be on April 20, 2021. Notwithstanding, we believe we have been more than reasonable and forthcoming and would like to avoid burdening the Court with an unnecessary discovery motion.

Sincerely,

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Yasin M. Almadani, Esq.

Attorneys for Claimant Roman Hossain

Cc: Maxim Price